

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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J.T., Individually and On Behalf Of D.T.;  
K.M., Individually and On Behalf Of M.M. and S.M.;  
J.J., Individually and On Behalf Of Z.J.;  
C.N., Individually and On Behalf Of V.N.; and,  
All Others Similarly Situated,

**Case 1:20-cv-05878-VEC**

Plaintiffs,

-against-

BILL de BLASIO, in his official capacity as the  
Mayor of New York City; RICHARD  
CARRANZA, in his official capacity as the  
Chancellor of New York City Department of  
Education; the NEW YORK CITY DEPARTMENT  
OF EDUCATION; the SCHOOL DISTRICTS IN  
THE UNITED STATES; and STATE  
DEPARTMENTS OF EDUCATION IN THE  
UNITED STATES,

Defendants.

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**AFFIDAVIT OF VICTOR D. SHANDOR**

Comes now, Victor D. Shandor, who, being of sound mind and lawful age, and having been duly sworn upon his oath, states based upon personal knowledge and investigation of the applicable records and resources of the County School Board of York County, Virginia ("School Board"), as follows:

1. My name is Victor D. Shandor. I am the Superintendent of the York County School Division. As the Superintendent, I am responsible for the direction, leadership, and coordination of students and staff in their efforts to reach the educational goals adopted

by the School Board. I am submitting this affidavit for the limited purpose of supporting the motion to dismiss for lack of personal jurisdiction filed on behalf of the School Board in this case.

2. The School Board is a political subdivision of the Commonwealth of Virginia existing pursuant to the Constitution and statutes of Virginia and is vested with the authority to supervise the public schools within York County. Va. Const., Art. VIII, § 7, Va. Code § 22.1-71; *see generally* Title 22.1 of the Code of Virginia. The School Board office is located at 302 Dare Road in Yorktown, Virginia, 23692.
3. The School Board does not have, and has not had, any offices, post office boxes, or other regular and established places of business in the State of New York.
4. The School Board has no facilities (owned or rented), in the State of New York and offers no academic instruction to students in the State of New York.
5. The School Board does not own any property within the State of New York, does not maintain any bank accounts within the State of New York, and has no telephone listing(s) within the State of New York.
6. The School Board did not incur any obligation to pay property or income taxes in New York in 2018, 2019, or 2020.
7. The School Board did not offer or provide any academic instruction or services of any type directly into New York or to New York students during 2018, 2019, or 2020.
8. The School Board has no employees, agents, dealers, or other representatives who work in the State of New York.
9. The School Board is not incorporated in New York.

10. The School Board does not have a registered agent for service of process in the State of New York.
11. The School Board was not served with process in this case within the State of New York.
12. In connection with the above-captioned lawsuit, I have investigated the role of the School Board with respect to the claims at issue in this case.
13. The School Board was not involved in any decision made to close schools in New York or to refrain from offering in-person instruction to special education students in New York during the spring of 2020.
14. The School Board was not responsible for providing instruction to special education students in New York during the spring of 2020.

FURTHER AFFIANT SAYETH NOT.

8-31-20  
Date

Victor D. Shandor  
Victor D. Shandor

COMMONWEALTH OF VIRGINIA

CITY/COUNTY of YORK, to wit:

I, Sandra Ford, a notary public in and for the City/County and Commonwealth aforesaid, to hereby certify that Victor D. Shandor, whose name is signed above, has acknowledged the same before me in my City/County and Commonwealth aforesaid and swears that the aforementioned is true and accurate to the best of his/her knowledge and belief.

Given under my hand this 31<sup>st</sup> day of August, 2020.

My Commission expires:

7-31-2021

Sandra Ford  
Notary Public

